

NOTE: The National Park Service was one of the first agencies in the country to adopt the new national food safety standard. The NPS Concessions and Public Health Program provided the following training in preparation for the transition from the 1976 USPHS/FDA Food Code to the 1995 edition. From its adoption in 1993 until its full implementation, a committee of NPS Public Health Consultants, Concessions Specialists and Concessioners met about the various facets of impact on the NPS food operations. East Coast and West Coast training sessions were held with a class size limit of twenty five for each of the day long training sessions. Following the same model, additional park level training was done to supplement the national level training.

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USPHS FOOD CODE SEMINAR: The Major Changes

What Do I Really Need to Know?



Seminar Objective: Provide NPS staff and food concessioners, from operator viewpoint, an overview of the major differences in the compliance standards for inspections in the USPHS/FDA Food Code which will be used for NPS concessions in FY 96

Target Audience: NPS Concessioners with management or supervisory responsibilities; NPS Concession Specialists; NPS rangers and other personnel with food inspection responsibilities

Time: Four - Six hours, depending on use of optional exercises and breaks

Seminar Overview:

I. Orientation

1. Background: What's Changed and Why?

II. Code Changes

1. People: The Most Important Piece in Foodborne Illness Prevention
2. Food: What Do We Need to Do to Keep It Safe?
3. Facilities: Highlights of the Few New Things

III. Food Inspection/Scoring Systems

1. Inspections: New Process and New Report
2. Concessions: New Scoring and Rating
3. Seminar Summary: Where Do We Go From Here?

Presenters: USPHS Regional Public Health Consultants; NPS Park Sanitarians and NPS Concession Specialists

USPHS FOOD CODE SEMINAR

I. Orientation

1. Background: What's Changed and Why?

Objective: Briefly provide students with an overview of new Food Code, a summary of the reasons for the changes and information on authoritative sources involved in formulating new code requirements.

Time: 30 minutes

Supplemental

Materials: Copy of Food Code (student edition) for each student; Copy of student manual (loose leaf format) for each student; Inspection Guides; Overhead projector; Slide projector and screen; Writing board, markers/chalk and eraser; Flip chart and markers; HACCP poster; Seminar registration forms

Optional

Exercises: Introductions (Self or Partner); List Student's Questions About Changes which need to be addressed during session; Use Sanitation Follies handout in teams to determine what they think are the most critical areas of food safety they as managers should be concerned about on a daily basis; Foodborne Illness Amazing Facts

Section Subjects / Teaching Points:

RECENT MAJOR FOODBORNE ILLNESS TRENDS

- Increasing relationship of Foodborne Illness to food worker health and hygiene issues - examples 10% increase per year for Hepatitis A; increasing international travel bringing developing country health problems to our dining rooms
- Emerging pathogens are dramatically increasing our illnesses and outbreaks; *Salmonella enteritidis* in eggs; *Escherichia coli* O157:H7 in ground beef; *Listeria monocytogenes* in ready to eat foods; Salmonella in melons; *Clostridium botulinum* in potatoes; *Vibrio vulnificus* in oysters
- Increasing susceptible populations - growing numbers of older and immunosuppressed customers
- Overlapping failures causing foodborne illness, ie. presence of Se and undercooked eggs
- Increasing public awareness and litigation
- Changing food production, processing, distribution and serving trends

REASONS FOR A NEW FOOD CODE

- Goal: Provide the most up to date food safety guidelines possible for food industry and regulatory programs in a clearly written document which provides a consistent system of scientifically sound basis
- Provide more specific information on good food safety practices
- Allow industry flexibility in compliance strategies without compromising food safety principles
- Better address food safety issues of emerging public health pathogens and epidemiological trends
- Dramatically higher degree of food safety by building in overlapping public health controls, ie. strict handwashing and no hands on ready-to-eat food

WHO WROTE IT?

- Participatory process - major changes suggested by Conference for Food Protection in mid '80's
- Input from industry (food service, food store and food vending), food safety professional associations, state and local regulatory officials, federal agencies (FDA, USDA, CDC) and international organizations (World Health Organization) and public comment (over 2000 pages from hundreds of sources)
- Literature reviews, foodborne illness data trends and academic, research, industry experts - what is being missed? what should future food safety concerns?

HACCP: FOOD SAFETY FUTURE

- What is it and where did it come from?
- What will it mean for the NPS concessioners?
- Food Code is based upon effective implementation of HACCP principles in each food establishment

FOOD CODE: *THE BOOK*

- How to Get It? - NTIS; FDA PRIME CONNECTION; Updates
- What Is in It? - Introductory Sections; Chapters; Annexes; Ogranized by Principles rather than subjects
- Format - Chapters, Parts, Subparts; Sections, Paragraphs...
- User Aids - *Italics*; In and Under provisions
- Criticals *; Non-critical; Swing items; Mixtures

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II. Code Changes

1. **People: The Most Important Piece in Foodborne Illness Prevention**

Objective: Provide information on changes in management requirements, health issues and hygiene standards

Time: 60 minutes

Supplemental

Materials: FMI Personnel video; Sample Management Responsibility Daily Checklist; Health Interview (Form 1); Employee Reporting Agreement (Form 2); Medical Referral (Form 3); International Travel Examples; Sample Handwash Notices with Procedures; Few Sheets of Toilet Paper; Nail Brush with a Tether

Optional

Exercises: Practice role playing of manager and employee applicant on discussion of health issues as related to food code compliance; Team discussions & presentations on options for complying with certain management responsibilities; One / two handwash demos; How do germs spread demo

Section Outline / Teaching Points:

MANAGEMENT KNOWLEDGE

- Food Manager Training and Certification fulfills this requirement - keep it fresh - things change - renew every 2 - 3 years
- Demonstrate knowledge in Preventing Foodborne Illness Transmission; Potentially Hazardous Foods storage, prep, cooking and holding; Equipment and Utensils and their cleaning and sanitizing; Backflow Prevention; Poisonous and Toxic Material controls; and HACCP

MANAGEMENT RESPONSIBILITIES

- More specific monitoring requirements: Handwashing; Food Source and Receiving; Cooking Temperatures; Cooling Temperatures; Undercooked Food Advisory; Equipment and Utensil Sanitizing; Clean Plate Notice

EMPLOYEE HEALTH

- Directed at the Big Four (CDC Report on Diseases Transmitted through Food): *Salmonella typhi*; *Shigella* spp.; *Escherichia coli* O157:H7; or Hepatitis A virus
- Applies to employees or applicants with conditional offer of employment
- Has one of the Big Four or symptoms including acute gastrointestinal illness (diarrhea, fever, vomiting, jaundice or sore throat with fever); or has had a previous illness from one of Big Four
- Lesion containing pus (boil or infected wound that is open and draining)
- Suspected in causing or being exposed to an outbreak from one of Big Four; lives in household with someone diagnosed with one of Big Four or who has attended an event works in a location that has a confirmed Big Four outbreak
- Someone who has traveled out of country within last 50 days
- Very specific guidance on Exclusion or Restriction of exposed or ill employees
- Management reporting of Big Four concerns to USPHS or Park Sanitarian

HANDWASHING: *THE ART*

- Single Wash: vigorously rubbing lathered hands together for 20 seconds with attention to nails and between fingers
- Double Wash required using toilet or otherwise exposed to bodily fluids and when beginning or returning to work; Use nailbrush on first; Why? - Better cleaning (dishwashing or hairwash example)
- Hand Sanitizers - After handwash; must be GRAS ingredients

PERSONAL HYGIENE

- Closed beverage container (ie sports bottle with heavy plastic straw) now allowed for food employees

2. Food: What Do We Need to Do to Keep It Safe?

Objective: Provide information on new changes most relevant to NPS Concessioners on food protection, cooking and holding temperatures and consumer advisory requirements

Time: 45 minute

Supplemental

Materials: Posters on food temperatures; Sample cooling graphs; Clean plate poster; No hand contact poster; Model Consumer Advisory; Sample logs for cooking and holding temperatures; Copies of newspaper articles on foodborne illness

Optional

Exercises: Pathogen modeling program "What If's" to show bacterial growth at various temperatures, pH and times; Cooling curve demo; PHF Quiz Show; Hands Off My Food Olympics

Section Outline / Teaching Points:

PROTECT THAT FOOD

- No bare hand contact with Ready-To-Eat food; Examples; Overlapping Public Health Safeguards; Reasons; Alternatives
- Use pasteurized eggs for foods like Caesar salad, hollandaise and bernaise sauce and beverages fortified with eggs

CCP #1: COOKING

- New cooking temperatures which deal with both Temperature and Time; Four dimensional illustrations; Time under the cooking temperature curve important, including post-cook rise; Examples of the three new cooking temperatures / times with various foods; Alternative combinations; roast beef cooking
- New microwave cooking / reheating guidelines
- Reheating commercial Ready-To-Eat food for hot holding

CONTROLLING TEMPERATURE AND TIME

- Two staged cooling - now the state of the art; Cooling methods specified
- Cold holding temperature changed to 5°C/41°F; No change in hot holding temperature
- Date marking Ready-To-Eat foods; Use by dates on commercially prepared foods; Discard out of date food
- Alternative of Using Time as a Public Health Control instead of temperature

CONSUMER ADVISORY

- When required -- not necessary in establishments that fully cook their food
- Review options for written consumer advisory
- Examine the model consumer advisory statement -- concessionaire companies may create their own for their operations based on model

3. Facilities: Highlights of the Few New Things

Objective: Provide a succinct overview of compliance changes with equipment, warewashing, plumbing and toxics items.

Time: 30 minute

Supplemental

Materials: W-R-S chart; Warewasher Poster; Cross-Connections Poster; Cleaning Schedule Poster; Vermin Control Poster; Toxics Storage Poster

Optional

Exercises: Problem Plumbing Game Show; Sanitizer Scramble; Vermin Vengeance; Toxics Tournament

Section Outline / Teaching Points:

(note: that some of these items are not considered critical, but are significant changes from current requirements)

NEW EQUIPMENT REQUIREMENTS

- Food contact materials must meet maximum lead content; limitation on copper use; pewter must be imitation; wood and wicker prohibited for food contact
- Thermometers: No glass for product thermometers; Cooler thermometers must be integral or permanently affixed; check calibration
- Ice and beverage dispensing: Contamination free design on orifice; beverage tubing and cold plate not in contact with ice for consumers
- Slash resistant gloves limited to raw PHF unless covered by single use glove; limited use for sponges

WAREWASHING

- Two compartment sinks not allowed for most NPS operations
- Cleaning frequency for food contact surfaces more specific
- Wash temperature for manual dishwashing now 110 F minimum
- Sanitizer exposure changes include: 25 ppm chlorine at 120 F allowed; chlorine contact time for manual and mechanical dishwashing methods now 10 seconds (other chemicals still at 30 seconds)

PLUMBING

- Hand sink requires at least 110 F water; nailbrush for food employee hand sinks
- Use of a carbonator requires vented dual check valve between it and copper water supply line
- Backflow prevention devices need to be inspected and service as required by manufacturer's instructions

Toxics

- Toxics need to conform to EPA registration and labeling requirements
- Pesticide application need to conform to NPS Integrated Pest management Guidelines
- Never transfer toxic item to a former food container
- Refrigerated medications for employees must be packaged and stored in leakproof container on lowest shelf

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III. Food Inspection/Scoring Systems

1. Inspections: New Process and New Report

Objective: Provide students with an overview of a HACCP focused inspection process, the reporting of items found out of compliance and the benefits of the new reporting system

Time: 15 minute

Supplemental

Materials: HACCP Data Collection Form; Inspection Guide; Example of manually completed report; Example of FDA EIS generated report

Optional

Exercises: You are the Inspector; Fixin' the Criticals; Flash Focus

Section Outline / Teaching Points:

INSPECTION PROCESS CHANGES

- New focus on food, flow and critical control points; menu review; specials not on menu
- HACCP follows the food
- Lots and lots of temperature evaluations

NOT DONE TILL THE PAPERWORK...

- New forms review
- Highlights of the new inspection report formats

HOW DID WE DO?

- Public health significance of criticals vs. non-criticals; swing items; repeats
- Corrections of criticals during the inspection
- What does it mean?; Comparisons with same establishment previous performance; comparisons against similar establishments possible
- FDA EIS can generate overview reports for concessions specialists and concessioners

2.

Concessions: New Scoring and Rating

Objective: Provide for a discussion by the concessions representative on committee recommendations and how the new program will be implemented by NPS concessions contracts

Time: 15 minute

Supplemental

Materials: Handouts provided by concessions

Optional

Exercises:

Section Outline / Teaching Points:

3. Seminar Summary: Where Do We Go from Here?

Objective: Provide students with a summary of the changes coming in implementing new USPHS/FDA food code, answer any outstanding questions from them and provide motivational message about benefits of moving food safety forward in NPS concessions

Time: 15 minute

Supplemental

Materials: Seminar Certificates; Implementation Time Table; List of Contact Telephone Numbers; New Compliance Check List; Seminar Critique Form

Optional

Exercises: Facility Analysis for Compliance; Staff Training Goals

Section Outline / Teaching Points:

PARTICIPANT QUESTIONS

- Review questions from preliminary list to make sure that all have been covered
- Answer any new questions which students have

IMPLEMENTATION PLANS

- Transition phase plans
- Contact list and use

SEMINAR HIGHPOINTS REVIEW

- Section by section review of most critical compliance items
- Many of new changes have already been successfully implemented within NPS years ago by various concessioners
- Vast majority of changes are operational and not structural so cost should not be a major concern in implementation

SEMINAR CERTIFICATE PRESENTATION